

PHASE I ENVIRONMENTAL ASSESSMENT REPORT

**BANNER FIBREBOARD PROPERTY
WELLSBURG, BROOKE COUNTY, WEST VIRGINIA**

Prepared For:

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METROPOLITAN PLANNING COMMISSION
AND
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- Appendix B – Historical Topographic Maps, Aerial Photographs, City Directory Abstract, and Sanborn Fire Insurance Maps
- Appendix C – EDR Environmental Database Search Report
- Appendix D – Site Photographs
- Appendix E – West Virginia Department of Environmental Protection FOIA Request Files
- Appendix F – User Questionnaire



1.0 INTRODUCTION

This report documents results of a Phase I Environmental Site Assessment (ESA) conducted on an approximate 3.2-acre property located at 22nd and Commerce Streets in Wellsburg, Brooke County, West Virginia. This property will be referred to as the “Site” or “subject property” throughout the remainder of this report. Civil & Environmental Consultants, Inc. (CEC) was retained by the Brooke-Hancock-Jefferson Metropolitan Planning Commission (BHJ) to perform this and other ESAs in Brooke and Hancock Counties under U.S. Environmental Protection Agency (U.S. EPA) Brownfields Assessment Grant No. BF 97384901-0. This ESA was performed in accordance with CEC’s proposal to BHJ dated September 24, 2009 and at the request of the current property owner, RDS Industrial, LLC (RDS).

1.1 PURPOSE

The purpose of this Phase I ESA is to identify, to the extent feasible pursuant to the process prescribed herein, recognized environmental conditions (RECs) in connection with the Site in accordance with American Society for Testing and Materials (ASTM), Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process E 1527-05 (“ASTM E 1527-05”). The term “recognized environmental conditions” means the presence or likely presence of hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release of hazardous substances or petroleum products into structures on the property or into the ground, groundwater, or surface water of the property. The term includes hazardous substances or petroleum products even under conditions in compliance with laws. The term is not intended to include *de minimis* conditions that generally do not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate government agencies. Conditions determined to be “*de minimis*” are not recognized environmental conditions.

1.2 SCOPE OF SERVICES

CEC performed the following scope of services to meet the objectives of the Phase I ESA.

1.2.1 Historic Review

CEC developed a history of the previous uses of the Site and surrounding area to attempt to identify the likelihood of past uses having led to RECs in connection with the Site. Historical U.S. Geological Survey (USGS) topographic maps, historical aerial photographs, and Sanborn Fire Insurance Maps were available for the subject property and were reviewed as part of this task. Results of a city directory search completed by Environmental Data Resources, Inc. (EDR) were also reviewed. The historical USGS topographic maps, historical aerial photographs, City Directories, and Sanborn Fire Insurance Maps are provided in Appendix B.

1.2.2 Government Agency Review

A computer search of reasonably, ascertainable, and practically reviewable government environmental agency databases was performed by EDR to determine if the Site or adjacent properties were listed on government databases indicative of potential environmental problems or notifications. At a minimum, federal, state, and tribal records reviewed for the environmental profile included those listed in ASTM E 1527-05 as available through EDR. The EDR environmental database search report is provided in Appendix C.

Please note that the correct address of the subject property is 22nd and Commerce Streets. The EDR database package was ordered with a 2400 Commerce Street address to locate the property with a numerical address. Interpretation of the information in the database report, Sanborn maps, aerial photographs, and historic topographic maps was not affected by the different address.

1.2.3 Site Reconnaissance

A Site reconnaissance was conducted by a CEC Environmental Professional (EP) on October 1, 2010. A follow-up Site visit was also completed on October 7, 2010. The objective of the Site visits were to evaluate current and former uses of the Site and surrounding properties, and to obtain information indicating the likelihood of identifying RECs in connection with the Site.

1.2.4 Interviews

The EP from CEC conducted interviews with persons familiar with the property in order to obtain information that could assist in identifying RECs at the Site or in the surrounding area. Interviews were conducted with a representative of the current property owner, a former facility supervisor, and a regulatory official. Because the current property owner was available to interview, interviews of neighboring property owners were not required or conducted.

1.2.5 Report of Findings

After completion of the above tasks, CEC prepared this Phase I ESA report describing the scope of services performed, the findings that include the identification of RECs and opinions of the impact of the RECs on the Site, and whether additional appropriate investigations would be necessary.

Unless otherwise explicitly stated, the scope of services for the Phase I ESA does not include the collection and analysis of any environmental media. In accordance with ASTM E 1527-05, issues considered beyond the scope of this Phase I ESA include asbestos-containing materials, radon, lead-based paint, lead in drinking water, wetlands, regulatory compliance, cultural and historic resources, industrial hygiene, health and safety, ecological resources, endangered species, indoor air quality, biological agents, and mold. In addition, issues regarding ionizing



radiation, oil/gas production, mineral rights and mining, and geotechnical suitability are also considered beyond the scope of this project.

1.3 SIGNIFICANT ASSUMPTIONS

CEC personnel completed this project with the following significant assumptions in mind:

- We are assuming that the users of this assessment as defined by ASTM are BHJ and the current property owner, RDS; and
- Persons interviewed during the assessment relayed any specialized knowledge or experience material to RECs.

1.4 LIMITATIONS AND EXCEPTIONS

CEC performed this environmental assessment consistent with professional standards and in accordance with the scope and limitations defined in ASTM E 1527-05. This report presents CEC's field observations, results, and opinions as they existed on the dates of the Site reconnaissance. This report is subject to modification by CEC, if CEC or any other party develops subsequent information. The scope of services focused on Site history and the identification of environmental hazards associated with past and current Site uses.

The reliability of information provided to CEC, including that provided by owners, occupants, subcontractors, and others, cannot be guaranteed. Performance of this environmental assessment is intended to reduce, but not eliminate, uncertainty of environmental conditions associated with the Site. Therefore, the information and comments made in this report should not be construed to warrant or guarantee the Site, or express or imply, without limitation, warranties as to its marketability or fitness for a particular use. Furthermore, the information that is provided in this report is not intended, nor should it be construed to be, legal advice. The review of site-specific documentation was limited to those items referenced in this report.



This assessment report was prepared on behalf of and for the exclusive use of BHJ and RDS. This report and its findings shall not, in whole or in part, be disseminated or conveyed to another party, nor used by another party in whole or in part, without prior written consent of CEC.

1.5 SPECIAL TERMS AND CONDITIONS

There were no additional services beyond appropriate inquiry as defined by ASTM E 1527-05 conducted to complete this Phase I ESA.

1.6 USER RELIANCE

This report is intended for the sole use of BHJ and RDS. The scope of services performed in execution of this evaluation may not be appropriate to satisfy the needs of other users, and use of this document or the findings, conclusions, or recommendations contained therein is at the risk of said user. Reliance by the client or lender on the facts, conclusions, and recommendations presented in this report is subject to the specific scope of services and contractual terms and conditions as written and agreed to in CEC's September 24, 2009 proposal. This includes explicit indemnification statements and limitations on CEC's financial liability.



2.0 SITE DESCRIPTION

2.1 LOCATION AND LEGAL DESCRIPTION

The Site encompasses approximately 3.2 acres and is located at 22nd and Commerce Streets, Wellsburg, Brooke County, West Virginia. The approximate Site location is presented on Figure 1. The Site is currently owned by RDS. Information provided on the Brooke County Assessor website (<http://brooke.wvassessor.com>) indicates the Site is located on four tax parcels. The tax parcel numbers for the subject property are:

- 07-W22K-0241-0000-0000;
- 07-W22K-0244-0000-0000;
- 07-W22K-0245-0000-0000; and
- 07-W22K-0246-0000-0000.

2.2 SITE AND VICINITY CHARACTERISTICS

As shown on Figure 1, the Site is situated in the city of Wellsburg and is surrounded by residential, commercial, and industrial properties. Commerce Street borders the Site to the east. Graphic Packaging International borders the Site to the north. The former Conrail railroad line borders the Site to the west (Appendix D: Photograph No. 7). Two vacant residential buildings are located adjacent to the Site at the intersection of 22nd and Commerce Streets (Appendix D: Photograph No. 33). The remaining portion of the Site's southern property boundary is bordered by 22nd Street. Residential properties are located south and east of the Site. Eagle Manufacturing, Inc. is located directly west of the former Conrail lines. Additional commercial properties are located northeast and southwest of the Site.



The Site and surrounding area are situated on a relatively level alluvial terrace approximately 1/4-mile east of the Ohio River, with the land surface approximately 25 feet above the normal pool elevation of the river. Accordingly, the groundwater table is expected to lie approximately 20 to 25 feet below ground surface within the alluvial sediments. Groundwater flow beneath the area is anticipated to be to the west-southwest towards the Ohio River. The Site as well as other residences and businesses in Wellsburg obtain drinking water from the local municipal water system and are served by the municipal sanitary sewer system. In addition, the Site contains four groundwater supply wells which provided process water for historical manufacturing operations at the Site (Appendix D: Photograph Nos. 4, 14, and 15).

2.3 CURRENT USE OF THE PROPERTY

The subject property is presently vacant and listed for sale. At the time of the Phase I assessment, the main Site building was observed in various degrees of disrepair. The majority of equipment and machinery in the buildings has been sold for reuse or scrap metal recycling and has been removed from the Site. Several large holes were observed in the first floor of the main Site building where machinery had been removed (Appendix D: Photograph No. 28). Piles of waste (primarily waste paper) were observed along the western half of the main floor area (Appendix D: Photograph No. 20). Empty containers and 55-gallon steel drums were also observed at random points of the subject property. Numerous polyethylene totes containing unused liquid products were observed in the stock room building (Appendix D: Photograph No. 32). According to the current property owner, the unused liquid wastes were segregated for offsite disposal, and the stock room was being used as a designated storage area until they are removed from the Site.

2.4 HISTORICAL USE OF THE PROPERTY

The historical and current use of the Site described in this section is based on discussions with persons interviewed during this Phase I ESA, a review of Sanborn fire insurance maps, and a



review of regulatory documents obtained from the West Virginia Department of Environmental Protection (WVDEP).

The Site was initially developed around 1922 by the Hammond Paper Bag Company (Hammond). Hammond manufactured paper bags from recycled paper through 1955 when the Site was sold to the Banner Fibreboard Company (Banner). Banner continued similar paper recycling operations. Products manufactured by Banner included linerboard for corrugated boxes and fire retardant paper board. Manufacturing operations at the Banner facility continued until July 2007, and the company filed for Chapter 7 bankruptcy in August 2007. RDS purchased the subject property at auction in February 2008. Under the ownership of RDS, the majority of the machinery in the Site buildings was scrapped. The Site is currently vacant.

2.5 DESCRIPTIONS OF STRUCTURES AND OTHER IMPROVEMENTS ON THE SITE

The subject property contains two primary buildings totaling approximately 130,000 square feet. The buildings consist of one main facility building and an auxiliary warehouse referred to as the “stock room”. The main Site building contains a basement, first floor, and a small second floor area. Manufacturing operations were performed in this building. The stock room and main Site building are connected by an enclosure. The enclosure contains a concrete ramp able to support forklifts and small vehicles. Secondary structures attached to the main Site building include a covered outdoor storage area, boiler room, garage, and coal ash shed. The boiler room, garage, and shed are attached to the main Site building but can only be accessed through outside doors. Buildings on the property are generally constructed with brick exteriors on block foundations.

Renovations to the subject property under Banner’s ownership included the additions of the roll storage room, the stock room, and additional office space. The roll storage room was constructed shortly after the purchase from Hammond. The stock room and office space were constructed during the 1990’s. Refer to Figures 2 and 3 for Site layout.

3.0 USER PROVIDED INFORMATION

The “user” of the Phase I ESA is defined by ASTM as “the party seeking to use Practice E 1527 to complete an environmental site assessment of the property.” A user may include, without limitation, a potential purchaser of property, a potential tenant of property, an owner of property, a lender, or a property manager. BHJ and RDS (current owner of the property) are the users of this Phase I. Mr. Robert Swindell of RDS provided the following information. A copy of the completed user questionnaire is included within Appendix F.

3.1 ENVIRONMENTAL LIENS OR ACTIVITY USE LIMITATIONS

Mr. Swindell is not aware of any environmental liens against the subject property that are filed or recorded under federal, tribal, state, or local law. In addition, Mr. Swindell is not aware of any activity use limitations (AULs), such as engineering controls, land use restrictions, or institutional controls, that are in place at the Site and/or have been filed or recorded in a registry under federal, tribal, state, or local law.

CEC did not independently verify that there are no environmental liens or AULs in connection with the property because this activity is beyond the scope of this assessment. However, the regulatory database search completed by EDR did not identify the presence of AULs on the subject property. CEC did contact the West Virginia Department of Environmental Protection (WVDEP) to determine whether the WVDEP maintains an Institutional Control (IC) or Engineering Control (EC) Registry. The WVDEP does not maintain an IC or EC Registry.

3.2 SPECIALIZED KNOWLEDGE

Mr. Swindell has no specialized knowledge of former processes used by Banner. Mr. Swindell has no direct experience or knowledge of paper recycling processes.

3.3 COMMONLY KNOWN OR REASONABLY ASCERTAINABLE INFORMATION

Mr. Swindell is generally aware of raw materials used during former manufacturing operations on the subject property. Raw materials used and stored on the Site included inks and dyes. Mr. Swindell is not aware of any spills or other petroleum or chemical releases that have occurred on the subject property. Mr. Swindell is not aware of any environmental cleanups that have taken place at the property.

3.4 VALUATION REDUCTION FOR ENVIRONMENTAL ISSUES

Mr. Swindell is not aware of any environmental issues on the subject property that could result in property value reduction.

3.5 OWNER, PROPERTY MANAGER, AND OCCUPANT INFORMATION

RDS is the current owner of the subject property. The Site is currently vacant and not in use.

3.6 REASON FOR PERFORMING PHASE I

CEC understands that RDS has requested this assessment as the current property owner to assist with the sale the subject property.



4.0 RECORDS REVIEW

4.1 STANDARD ENVIRONMENTAL RECORD SOURCES

A search of federal and state environmental databases was performed by EDR to evaluate if the Site and/or adjacent properties were included on government databases indicative of potential environmental concerns or notifications. The search radius for each database was, at a minimum, as specified by ASTM E 1527-05. The complete environmental database report (dated September 28, 2010) is presented in Appendix C.

4.1.1 The Subject Property

Banner was listed by EDR as a Resource Conservation and Recovery Act (RCRA) Non Generator (NonGen), a West Virginia Underground Storage Tank (UST), and a WV National Pollutant Discharge Elimination System (NPDES) facility. RCRA-NonGen facilities do not presently generate hazardous waste. Further information in the EDR report identified Banner as a RCRA-Conditionally Exempt Small Quantity Generator (CESQG) facility between 2005 and 2007 and as a RCRA-Small Quantity Generator (SQG) facility prior to 2005. RCRA-CESQG facilities generate less than 100 kg of hazardous waste per calendar month, and RCRA-SQG facilities generate between 100 kg and 1000 kg of hazardous wastes per month.

The EDR report listed one regulatory violation for the subject property. The area of violation was listed as 'used oil – processors and re-refiners'. The violation occurred in 1996 and EDR reports compliance was achieved in 1998. Information obtained from a Freedom of Information Act (FOIA) request submitted to the WVDEP revealed that the violation was a citation for improper labeling of used oil containers at the facility. WVDEP correspondence regarding the violation and achievement of compliance is presented in Appendix E.

Finally, information in the West Virginia UST database stated a 2000-gallon gasoline UST was installed in 1976 on the Site but was closed and removed in 1990. Information obtained in the FOIA request indicates that no releases were identified during the closure; however, no sampling or analytical results confirming clean closure were included in the documentation. Closure documentation obtained from the WVDEP is presented in Appendix E.

4.1.2 Offsite Properties

The following were identified within 1/8-mile of the Site:

- Continental Baking Company is located within 1/8-mile and east-northeast of the Site, and was identified as a West Virginia UST facility. EDR reports two gasoline USTs were closed and removed from the property in 1989;
- Altivity Packaging, LLC is located within 1/8-mile and north of the Site, and was identified as a RCRA-CESQG facility. No violations were reported for this facility. In addition, the listed address for Altivity Packaging, LLC matches the current address for Graphic Packaging International;
- Stone Container Corporation was listed at the same address as Altivity Packaging, LLC. Stone Container Corporation was identified as a West Virginia UST facility. EDR reports the one 500-gallon gasoline UST was closed in placed on the property. The tank closure occurred in 1960;
- Exxon Station #23241 is located within 1/8-mile and southwest of the Site, and was identified as a West Virginia Leaking Underground Storage Tank (LUST) and UST facility. EDR reports the release occurred in May 1991 and cleanup was initiated in January 1997. Cleanup status is not reported. The UST database reports three gasoline USTs were closed and removed from the site in July 1990; and



- Eagle Manufacturing Company is located within 1/8-mile and west of the Site and was identified as a RCRA-CESQG, West Virginia LUST, West Virginia UST, and West Virginia NPDES facility. Non-specific waste handling violations were reported for this facility. EDR reports a UST release occurred in August 1990 with cleanup initiated and completed during the same month. The UST database reports three USTs containing hazardous substances were closed and removed from the site in July 1990. The NPDES permit for the site expired in February 2004.

The following were identified within 1/4-mile of the Site:

- Wellsburg Home Gas is located within 1/4-mile and southwest of the Site, and was identified as a Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) site. EDR reports the site was assessed in January 1998. Based on the result of the assessment, the site was not put on the National Priorities List (NPL);
- Kroger N-268 is located within 1/4-mile and north of the Site, and was identified as a RCRA-CESQG and WV UST facility. No waste handling violations were reported for the facility. EDR reports one 24,000-gallon gasoline UST as 'currently in use' at the site. The installation date for the UST was July 2005;
- An unnamed service station is located within 1/4-mile and northeast of the Site, and was identified as West Virginia UST facility. EDR reports two 2000-gallon USTs were closed and removed from the site in April 2002. The tank substances were not reported; and
- Central Cab Company is located within 1/4-mile and north of the Site, and was identified as a West Virginia UST facility. The EDR report lists one 10,000-gallon kerosene UST



as temporarily out of service, one gasoline UST closed and removed from the site, and two diesel USTs closed and removed from the site.

The following were identified within 1/2-mile of the Site:

- WVA Energy, LLC is located within 1/2-mile and south of the Site, and was identified as a West Virginia LUST facility. EDR reports a release occurred during March 1998. The stored substance, cleanup initiation date, and cleanup completed dates are not reported.

Based on the findings of the environmental database search, it is our opinion that offsite properties Continental Baking Company and Stone Container Corporation have the potential to cause RECs on the subject property. Both offsite properties are listed by EDR as WV UST facilities. EDR reports USTs on these properties have been closed. However, both properties are located in expected hydraulically upgradient positions from the subject property. Stone Container Corporation is located north and adjacent from the Site, and Continental Baking Company is located at the intersection of Togo and Commerce Streets, less than 150 feet from the subject property.

Based on facility status and/or location relative to the subject property, it is our opinion that none of the remaining offsite properties identified in the environmental database report are expected to cause RECs or significant impacts to the subject property.

4.1.3 Orphan Sites

Not all sites or facilities identified in the federal and state records can be accurately located in relation to the Site due to incomplete information supplied to the regulatory agencies. These facilities, referred to as 'Orphan Sites' by EDR, are identified in the federal/state records in Appendix C. Seventeen orphan sites were identified by EDR with inadequate address information for mapping purposes. 'Banner Fibreboard Company' was listed as two of the

seventeen orphan sites. A discussion of database search results for Banner, including the databases listings in the orphan summary, is presented in Section 4.1.1. None of the remaining 'orphan sites' were observed in the immediate vicinity of the Site and are unlikely to have the potential to cause RECs on the Site.

4.2 PHYSICAL SETTING SOURCE

The USGS topographic map used to prepare Figure 1 (Steubenville Quadrangle dated 1968 and photorevised 1978) was reviewed to evaluate the general physiographic setting of the Site. Additional physical setting source information, including soil types, geology, and the location of water supply wells, is presented at the end of the EDR report in Appendix C.

The US Department of Agriculture's (USDA) Soil Conservation Service (SCS) does not list a soil type for the subject property due to its location within an urban setting.

Several water wells were identified within one mile of the subject property in the Federal USGS and state databases. Information in regards to depth to groundwater or bedrock was limited. In particular, recorded groundwater level measurements at several wells were collected many years ago and may not represent depths to the uppermost aquifer. Finally, no federally listed public water supply wells were identified within one mile of the Site.

4.3 REGULATORY DOCUMENTS AND RECORDS

Several regulatory and facility documents for Banner were obtained from a FOIA request submitted to the WVDEP. Documents reviewed as part of this ESA, include:

- NPDES Permit Renewal (WV0004430) for Banner Fibreboard Company, prepared by MSES Consultants, Inc., March 2005;
- UST documents for the facility;

- WVDEP facility inspection reports; and
- WVDEP Closure Inspection Report, dated September 6, 2007.

Information obtained from these documents pertaining to the current operations and structures at the Site is discussed in Section 6.0 of this report. Information pertaining to ownership history is presented in Section 4.4. Select documents obtained from the WVDEP FOIA request are presented in Appendix E.

4.4 HISTORICAL USE INFORMATION ON THE SITE AND ADJOINING PROPERTIES

CEC obtained several historic information sources, including historical aerial photographs, historical topographic maps, City Directories, and Sanborn Fire Insurance Maps.

A discussion of the review of property ownership, historic topographic maps, aerial photographs, City Directories, and Sanborn Fire Insurance Maps is provided below.

4.4.1 Property Ownership Summary

CEC was not provided a chain-of-title for the subject property. A summary of property ownership, based on information from interviews, a review of regulatory documents, and Sanborn fire insurance maps, is as follows:

- The Site was first developed in 1922 by Hammond Paper Bag Company. Hammond manufactured paper products from recycled paper;
- Banner purchased the subject property from Hammond in 1955. Paper products, primarily linerboard, continued to be manufactured on the Site;
- Manufacturing operations on the Site stopped in July 2007, and Banner filed for Chapter 7 bankruptcy in August 2007; and

- RDS purchased the subject property in February 2008 through auction from John E. Gompers, a trustee of the bankruptcy court.

4.4.2 Historical USGS Topographic Maps

USGS Topographic Maps dated 1904, 1942, 1958, 1968, 1978, 1981, and 1997 were reviewed for evidence of past Site use. Copies of these maps are presented in Appendix B. Light shading on the 1958 through 1997 topographic maps indicate the subject property and immediate surrounding area are contained in a densely developed area. With the exception of the 1958 map, no buildings are depicted on the subject property during these years. The footprint of the Site building is depicted on the 1958 map. The 1904 and 1942 topographic maps are produced on a small map scale (15-minute series) and provide little informative detail. Regardless, no changes to the topography on the subject property can be depicted on the topographic maps. The 1958 map also depicts adjacent industrial/commercial buildings north, northwest, and west of the subject property. Commerce Street (West Virginia State Route 2) is labeled 'under construction' on the 1958 map. No other changes in structures or topography in the immediate surrounding area can be depicted on the topographic maps.

4.4.3 Historical Aerial Photographs

Aerial Photographs dated 1954, 1966, 1993, 1997, 2005, and 2006 were reviewed for evidence of past Site use. Historical Aerial Photographs for 1948, 1959, 1976, 1982, and 1988 were also obtained, but the clarity of the photographs is poor and the features depicted in the photographs are indiscernible. Copies of the photographs are presented in Appendix B. The Site building(s) are observed on the 1954, 1966, 1993, 1997, 2005, and 2006 photographs. The Site buildings as they appear today are observed on the 1993 through 2006 photographs. The 1966 photograph shows the Site building without the addition of the stock room building. The 1954 photograph depicts the Site building without the covered outdoor storage area in the southwest portion of the property. The photographs also indicate that surrounding land use has not changed significantly

since 1954, with the exception of the addition of the industrial buildings (currently Graphic Packaging International) immediately north of the site between 1954 and 1966.

4.4.4 City Directory Abstract

A city directory search which provides historical city directory information for a property and its surrounding area was conducted by EDR. EDR's city directory abstract is a screening tool designed to assist EP's in evaluating potential liability on a subject property resulting from past activities. Business directories including city, cross reference, and telephone directories were reviewed, if available, at approximately five year intervals for the years spanning 1975 through 2010. The abstract compiles information gathered by geocoding the latitude and longitude of identified subject property and then gathering information about properties adjoining the subject property.

The subject property address is 22nd and Commerce Streets. However, a numerical address is required by EDR to complete a city directory search. 101 22nd Street was used as the target address for the purpose of the city directory search. According to the city directory abstract, Banner was listed at the following addresses (the year of the city directory listing is presented in parentheses):

- 141 22nd Street (1979, 1975);
- 70 22nd Street (1987, 1982, 1979, 1975); and
- 71 22nd Street (1997, 1992).

In addition to Banner, Brooke County Opportunity Center was also listed at 71 22nd Street during 1997 and 1992. Residential uses were listed for adjoining addresses with the exceptions of the following:

51 22nd Street:

- O'Lollone's Service, Tammy's Beauty Salon (1997, 1992);
- Lallone's Exxon Service (1987, 1982, 1979); and
- Erskine Glass & Manufacturing Company (1975).

Please note that property usage cannot always be determined from a business name. The complete city directory abstract is contained in Appendix B.

4.4.5 Sanborn Fire Insurance Maps

Sanborn maps dated 1923, 1929, 1946, and 1960 were obtained from EDR and reviewed for information regarding historic use of the subject property and surrounding area. Copies of the maps are presented in Appendix B. Sanborn maps dated 1897 and 1913 were obtained but do not provide coverage for the subject property. Please note that due to the quality some details, text, and scale presented on these maps are difficult to distinguish. Details regarding uses of the subject property and surrounding use information of a known or possible environmental concern with respect to the subject property are presented below:

1960: The Site building is identified as Banner. Rooms identified in the Site building are labeled boiler room, maintenance and stage, shipping, machine room, and office. Two pumphouses are identified in the northwest portion of the Site. The adjacent offsite property to the north is identified as West Virginia Pulp and Paper Company. Manufacturing use is identified as 'paper bag manufacturer' for this property. Erskine Glass and Manufacturing Company is identified to the west across the railroad tracks. South of Erskine Glass is a facility identified as County Road Repair Shop. Two residential dwellings are identified adjacent and southeast of the property at the corner of 22nd and Commerce Streets. South of the Site, beyond 22nd Street, a facility identified as State Highway Department and residential dwellings are located. An auto repair shop is identified to the east at the north corner of Commerce and Togo



Streets. A used auto sales and service facility is identified at the south corner of Commerce and Togo Streets. Remaining properties to the east are identified as residential properties.

1946: The Site building is identified as Hammond Bag & Paper Company and labels the Site building as a manufacturer of paper flour sacks. Rooms identified in the Site building are labeled boiler room, rope cutting, rope stage and cutting, bag department, printing, bag stage, machine room, and coating room. The adjacent offsite building to the north is identified as Arkell & Smith Paper Bag MFG Mutual Risk. The Wellsburg Refrigerating Company is now identified north of the Erskine Glass and Manufacturing Company. Two apparent gasoline storage tanks are now identified at the auto repair facility previously identified at the north corner of Commerce and Togo Streets. However, Togo Street is not depicted on the 1946 Sanborn map. Four residential dwellings are now identified adjacent and southeast of the subject property at the corner of 22nd and Commerce Streets. Commerce Street is depicted as a narrow street. No other significant changes are observed.

1929: No pumphouses are identified on the subject property. Changes in the Site building include the depiction of the boiler location in the boiler room and the absence of a steel frame addition on the southeastern portion of the Site building. The boiler system is depicted on the eastern half of the boiler room. A contractor storage yard is identified adjacent and north of the Site. Residential dwellings are depicted at the previously identified State Highway Department property. The previously identified auto repair shop east of the subject property is not identified in the 1929 map.

1923: No significant changes to the Site building are observed. A foundry labeled as 'not used' is depicted north of the Site. A warehouse is depicted at the previously identified County Road Repair Shop property. Two apparent gasoline storage tanks are depicted on the warehouse property.



1913: The McInnes McCleary Foundry Company is depicted north of the subject property. Map coverage for the subject property and remaining adjacent properties is not provided.

1897: Map coverage for the subject property and adjacent properties is not provided.



5.0 INTERVIEWS

CEC conducted interviews with a representative of the current property owner, a former manager of the Banner facility, and a local environmental regulatory official in order to obtain information indicating RECs in connection with the Site. Those persons interviewed were asked to provide responses that were to the best of their knowledge. Specifically, CEC personnel conducted interviews with the following persons:

- Mr. Robert Swindell, minority owner of RDS, the current property owner;
- Mr. Dan Gilchrist, former plant manager of Banner; and
- Mr. Jamie Fenske, Environmental Inspector Supervisor for the Northern Unit of the WVDEP.

A summary of the information obtained during the interviews is outlined below. Detailed information provided by these individuals is also presented in other sections of this report.

5.1 CURRENT PROPERTY OWNER

Mr. Robert Swindell was interviewed by telephone (330-429-0444) on October 20, 2010 and provided the following information:

- Mr. Swindell stated RDS purchased the subject property through a bankruptcy auction in February 2008;
- Mr. Swindell stated RDS has removed equipment, machinery, and other scrap metal from the property for recycling;
- Mr. Swindell indicated a waste inventory had been performed by WVDEP during their facility closure site inspection in September 2007. A copy of the waste inventory report

was requested from Mr. Swindell, but he did not have a copy. However, he stated no hazardous substances were identified during the waste inventory with the exception of a container of mercury. The WVDEP reportedly removed the container of mercury on the date of their inspection;

- Based on the results of the waste inventory, the WVDEP requested RDS segregate wastes on the property for disposal and track future removal of the wastes through manifests. Mr. Swindell stated RDS plans to remove liquid wastes on the property for disposal at a specialized landfill where pretreatment can be performed to solidify the waste. The liquid wastes are presently stored various containers located in the stock room building. RDS has made arrangements with a paper recycling plant located in Ohio to take waste paper and unused dry raw materials that remain on the subject property. Mr. Swindell stated waste removal will be completed by RDS before the subject property is sold;
- Electrical transformers were removed from the Site under RDS ownership. The transformer oil was tested and determined to be non-polychlorinated biphenyls (PCB) containing oil. The transformers were returned to the original manufacturer located in Ohio. Documentation regarding the testing and disposal of the transformers was requested from Mr. Swindell, but he was unable to provide the requested information;
- Demolition of the remaining onsite structures/buildings (except the stock room building) will be performed by RDS before the subject property is sold; and
- With the exception of a UST historically used to store fuel oil for firing the boiler, Mr. Swindell was unaware of any underlying environmental issues that could have resulted in RECs on the subject property.



5.2 FORMER PLANT MANAGER

Mr. Dan Gilchrist was interviewed in person on October 1, 2010 during the Site Reconnaissance and provided the following information:

- Mr. Gilchrist worked at the subject property from 1954 through 2000. The plant was the Hammond Paper Bag Company when he was first hired. Banner purchased the Site in 1955. Mr. Gilchrist served as plant manager through the 1990's until he retired in 2000;
- General descriptions of Site operations and manufacturing processes as discussed in Section 6.3;
- Mr. Gilchrist believed the subject property was first developed when Hammond built the paper recycling plant around 1922;
- Initially, a coal-fired boiler was used to heat the Site building. Approximately 30 years ago, a combination natural gas/oil-fired boiler was installed. No. 6 fuel oil, which was stored in a 21,000 gallon UST, was used to fire the boiler. Waste oil produced from plant operations was also added to the tank as a fuel for the boiler. If insufficient oil was available, the plant switched to natural gas to fire the boiler. Additional overhead natural gas fired heaters were used as auxiliary heat in various parts of the Site buildings. Air conditioning was provided in Site office spaces using window and roof-mounted air conditioning units;
- Typical maintenance and repairs on Site equipment and machinery was performed by plant personnel. Larger repairs were performed by subcontractors. All used oil from maintenance operations was placed in the 21,000 gallon UST. Mr. Gilchrist was unaware of chlorinated solvents being used on the Site;

- The rail spur on the west side of the subject property was briefly used under the ownership of Banner. The use of trucks for shipping and receiving was proven more cost efficient;
- The elevator and plant machinery operated on electric motors;
- The approximate 2,000 gallon steel aboveground storage tank (AST) observed in the second floor alum room was used for operation of the boiler system. This AST stored water;
- The printing room and was closed approximately 25 years ago and the printer was sold. The printer was used to add labels and text to linerboard;
- The chlorinator room was used to add chlorine to the process water. Chlorine was stored in a polyethylene tank and was used to manage algae that could affect finished product;
- Mr. Gilchrist was unaware of any compliance violations that occurred on Site that would have resulted in RECs on the subject property. Mr. Gilchrist stated Banner received several notices of violation from the WVDEP related to the discharge of colored water to the city's sanitary sewer system. The colored water was the result of using dyes in the manufacturing process. Mr. Gilchrist stated the dyes were not hazardous substances, but the Wellsburg Wastewater Treatment Plant (WWTP) was unable to remove certain colors during the treatment process. Color was regulated for aesthetic reasons by the WVDEP;
- Mr. Gilchrist stated the only existing UST on the subject property is the 21,000-gallon UST historically used to store oil to fire the boiler. Mr. Gilchrist stated a 2,000-gallon gasoline UST was removed in 1990. Although Mr. Gilchrist could not recall the exact location, he indicated the approximate location of the gasoline UST and fuel dispenser

was between the 21,000 gallon oil UST and the stock room. The footprint of the stock room may even cover a portion of the former UST area. Mr. Gilchrist stated gasoline was used to fuel equipment, primarily forklifts. The UST was removed when Site forklifts were switched to propane engines;

- Mr. Gilchrist was unaware of any significant spills, releases, or disposal of hazardous substances or petroleum products on the subject property; and
- Mr. Gilchrist was unaware of any other events that could have resulted in RECs on the subject property.

5.3 REGULATORY OFFICIAL

CEC contacted Mr. Jamie Fenske of the WVDEP by telephone (304-238-1220) on October 22, 2010 to inquire about potential environmental issues or problems at the Site. Mr. Fenske is the Environmental Inspector Supervisor for the Northern Unit of the WVDEP. Mr. Fenske stated he was present for the closure inspection performed in September 2007. This was Mr. Fenske's only inspection of the Site. His comments were consistent with the WVDEP September 6, 2007 Closure Inspection report reviewed by CEC (Appendix E). Mr. Fenske stated that the only hazardous materials/waste identified during the inspection included a container of mercury which was removed by the WVDEP at the time of the Site inspection. He indicated that the remaining waste materials were believed to be non-hazardous and would be removed by RDS. Mr. Fenske stated his main concern was the 21,000 gallon fuel oil UST remaining on the property. At the time of the inspection, Site personnel could not provide the configuration of the UST and whether cathodic protection was present. Mr. Fenske also observed large amounts of process water and sludges in the north area of the basement. Finally, Mr. Fenske stated the WVDEP requested documentation for all waste materials that are removed from the site.



6.0 SITE RECONNAISSANCE

6.1 METHODOLOGY AND LIMITING CONDITIONS

Mr. Robert Tatsch (EP) performed a Site reconnaissance on October 1, 2010, while accompanied by Mr. Gilchrist. Mr. Tatsch performed a follow-up Site visit on October 7, 2010. During the Site visits, Mr. Tatsch:

- Walked the interior of the Site buildings;
- Walked the outdoor and perimeter portions of the Site;
- Observed land use and types of operations to the north, south, east, and west of the Site; and
- Took photographs documenting Site conditions.

Photographs taken during the Site reconnaissance are presented in Appendix D.

Limitations experienced during the Site reconnaissance included, but may not be limited to, limited visibility in the basement of the Site building. However, this limitation was not significant with respect to identifying RECs at the Site. Observations noted during the Site visit are described below.

6.2 GENERAL SITE SETTING

The Site is located at 22nd and Commerce Streets in the town of Wellsburg, Brooke County, West Virginia. The Site consists of approximately 3.2 acres with a main facility building, a stock room building, and several smaller attached buildings. The Site is relatively flat. The Site buildings and pavement cover a majority of the property. Outdoor unpaved portions of the Site include gravel lots on the south and northeast sections of the property, a grass-lined area to the west of the boiler room, open space between the main Site building and the stock room, the



railroad spur along the western property boundary, and a thin grass-lined area between the stock room and Commerce Street.

Commerce Street borders the Site to the east. Graphic Packaging International borders the Site to the north. The former Conrail railroad line borders the Site to the west (Appendix D: Photograph No. 7). Two vacant residential buildings are located adjacent to the Site at the intersection of 22nd and Commerce Streets (Appendix D: Photograph No. 33). The remaining portion of the Site's southern property boundary is bordered by 22nd Street. Residential properties are located south and east of the Site. Eagle Manufacturing, Inc. is located across the former Conrail lines and west of the Site. Commercial properties are located northeast and southwest of the Site.

6.3 DESCRIPTION OF HISTORICAL OPERATIONS AND FACILITIES

Manufacturing operations at the subject property ceased in July 2007. The following description of historical operations and Site facilities is based on interviews conducting during the assessment, a review of WVDEP regulatory files, and CEC's observations during the Site reconnaissance.

6.3.1 Primary Process

The primary operation at the facility was the production of paper packaging products, primarily linerboard for corrugated boxes, from recycled waste paper. Manufacturing at the Site ceased in July 2007. At the time of the Site reconnaissance, a majority of the manufacturing equipment had been removed from the Site. A general description of historical processes at the Site is provided below. The locations of the Site features described below are shown on Figures 2 and 3.



- The primary raw material in the manufacturing process was waste paper, which is referred to as “furnish”. Banner received shipments of furnish by truck. Furnish was placed in storage bays located on the on the main floor in the Site building before processing;
- The two main mechanical components of the process were the pulper system and the paper machine;
- Furnish was placed into hydropulpers where process water and steam was added to defiber the furnish into pulp stock. Using separate hydropulpers, three pulp stocks were produced. These were identified as top liner, underliner, and filler liner pulp stocks. The pulp stocks achieved a slurry consistency when produced. Additional components of the pulper system refined the pulp stock before it was directed to the paper machine;
- According to Mr. Gilchrist, additives used within the pulper system were alum (aluminum sulfate), caustic soda (sodium hydroxide), and various polymers, resins, whiteners, and dyes; and
- Once refined, the pulp stock was directed to the paper machine. The pulp stock slurry was poured onto a continuous conveyor loop, referred to as a felt, from one of the headboxes. The pulp stock first passed through the ‘wet end’ of the machine where water was filtered out to form a wet sheet of fiber. The sheet was then directed to the press section where more water was squeezed out under high pressure. The pressed sheets were then directed to the dryers where the remaining water was removed. The paper was then cut at the disc refiner and rolled.

6.3.2 Process Water

Process water was obtained from onsite groundwater wells (Appendix D: Photograph Nos. 4, 14, and 15). Banner referred to the process water as ‘make-up’ water. Contact process water was used to produce the pulp stock. Non-contact process water was used to cool the paper machine and did not come in contact with stock or chemical additives.

Contact process water was used in the pulper system to prepare furnish into pulp liner stock. Contact process water was removed from the stock at the paper machine. A majority of contact process water was captured beneath the paper machine and was directed by piping to two recirculation tanks located in the basement. Water in the recirculation tanks was re-processed for return to the pulper system. Contact process water that was not captured fell to the basement floor. A system of concrete trenches directed the waste water to two floor drains in the north section of the basement. The floor drains were connected to the public sanitary sewer system, and the waste water was ultimately directed to the City of Wellsburg Wastewater Treatment Plant.

Banner’s NPDES permit (WV0004430) allowed for discharge of non-contact process water through Outfalls 001 and 002. Outfalls 001 and 002 discharged to the City of Wellsburg’s storm sewer collection system. A review of recent Discharge Monitoring Reports submitted to the WVDEP from 2002 through 2007 indicates that there were no exceedances of permitted discharge limits. Parameters monitored under the NPDES permit included total suspended solids, pH, iron, lead, nitrogen, phosphorous, oil and grease, and color.

6.3.3 Process Support Systems and Installations

Ancillary operations and/or systems include the following:



- The railroad spur along the west side of the Site, which was previously used to receive bulk shipments of waste paper (Appendix D: Photograph No. 7). According to Mr. Gilchrist, the rail spur was only used for a short time during Banner's ownership. Shipments of waste paper were then delivered by truck;
- The 21,000-gallon UST located near the boiler room, which was historically used to store oil for use in firing the Site's boiler system. Fuel oil and waste oil which was collected during Site maintenance operations was stored in the UST. Documentation obtained from the WVDEP indicates the UST was installed in 1970 by a certified tank installer. The tank and piping are reportedly constructed of steel. The 21,000-gallon UST and associated piping remain on the Site (Appendix D: Photograph No. 11);
- The motor control room is located in a small separate building between the main Site building and stock room (Appendix D: Photograph No. 16). Process machinery was operated using drive belts from a central electric motor system. This building regulated operation of the motors;
- The chlorinator room is a small building located adjacent to the motor control room and contained one polyethylene storage tank (Appendix D: Photograph Nos. 16 and 17). Chlorine was stored and injected into process water from this building. Chlorine was added to control microbes that could affect finished paper products;
- The oil storage room was located in northeast portion of the main Site building (Appendix D: Photograph No. 27). Banner stored 55-gallon drums of various petroleum products in the room including motor oil, hydraulic oil, machine oil, and grease. The room is constructed with a concrete floor;



- The 2000-gallon gasoline UST located outdoors in the northeast portion of the subject property. Documentation obtained from the WVDEP indicates the fiberglass UST was installed in 1976 by a certified tank installer and was removed in 1990. The documentation states a site assessment was completed and no evidence of leaks was detected; however, no sampling or analytical results confirming clean closure were included in the documents. Gasoline was used to fuel forklifts on the Site before they were switched to propane;
- The boiler room is attached to the northern portion of the main Site building (Appendix D: Photograph Nos. 10 and 13). The boiler room contained a combination natural gas/oil-fired boiler system used to heat the main Site building and provide steam for the hydropulpers. This building previously contained a coal fired boiler approximately 30 years ago;
- The coal ash shed is attached to the eastern wall of the boiler room. Coal ash was stored in the shed when the Site operated a coal-fired boiler. The shed was used for miscellaneous storage thereafter;
- The alum room is the only second floor area in the main Site building (Appendix D: Photograph Nos. 29 and 30). The room was used for mixing aluminum sulfate into the pulper system. In addition, an AST was located in the room that was used to store water for use in the Site boiler system;
- Mechanical repairs and pipe cutting were completed in the south section of the basement; and
- The printing room and ink storage area were located on the main floor near the center of the main Site building. The print shop was used to apply text and labels to finished paper



products. Printing operations stopped approximately 25 years ago. The printer was sold at that time.

6.3.4 Utility Services

Municipal water, sanitary sewer, natural gas, and electric services are available from local utilities. The Site is presently idle, and utility service has been disconnected.

6.3.5 Storm Sewers and Storm Water

Stormwater was discharged from the Site via two of the four outfalls listed under the Site's NPDES Permit No. WV0004430. Outfall 004 discharged stormwater from gravel lots and outside work areas. Outfall 005 discharged stormwater from roof drains. Both outfalls discharged to the City of Wellsburg's storm sewer collection system. Banner collected analytical samples from Outfall 004 on a monthly basis if sufficient flow was observed. Outfall 005 required no sampling and analysis under the permit. A review of recent Discharge Monitoring Reports submitted to the WVDEP indicates that there were no exceedances of permitted discharge limits at Outfall 004.

6.3.6 Electric Power Systems and PCB Concerns

Pole-mounted electrical transformers were previously located in the outdoor area west of the stock room. These transformers were removed after RDS purchased the Banner property. According to RDS, the transformer oils were tested and found to be non-PCB oils. The transformer cases were then returned to the original manufacturer located in Ohio. No documentation for the electrical transformers was obtained as part of this assessment.

6.3.7 Hazardous Substances

Banner used varsol (mineral spirits) for machinery cleaning and maintenances purposes. WVDEP file documents indicate Banner typically used five to ten drums of varsol per year. In a letter from Banner to the WVDEP dated July 26, 2005, Banner stated varsol was no longer used on the Site at that time. Reportedly, no chlorinated solvents were used on the Site.

6.4 INTERIOR AND EXTERIOR OBSERVATIONS

The following conditions were observed during the October 1, 2010 and October 7, 2010 Site visits.

6.4.1 Drums and Containers

Drums and other containers used for the storage of raw materials or petroleum products were observed at several locations during CEC's Site reconnaissance. The majority of the drums and containers were located on concrete floors inside Site buildings. A summary of the drums and containers is as follows:

- Various 55-gallon steel drums, fiberboard drums, plastic drums, polyethylene totes, and containers were observed throughout the main Site building. The fiberboard drums appeared to contain solid or powdered process materials. The majority of the steel/plastic drums and containers were empty or contained small amounts of unknown liquid or solid residue. Spills and minor staining was observed on concrete floors beneath a few of the drums and containers;
- Several empty, unlabeled 55-gallon steel drums were observed in outdoor portions of the subject property. Several empty drums were observed on the concrete slab of the covered outdoor storage area (Appendix D: Photograph No. 3), one empty drum was observed



adjacent to the western rail spur (Appendix D: Photograph No. 8), and one empty plastic drum was observed at the 21,000-gallon waste oil UST area (Appendix D: Photograph No. 11). No staining or other signs of releases from these drums were observed;

- Several 55-gallon drums of new oil and other lubricants were observed in the oil storage room within the main Site building (Appendix D: Photograph No. 27); and
- Numerous polyethylene totes and containers were observed in the stock room building (Appendix D: Photograph No. 32). These containers were filled with unused liquid process materials and were being stored for future offsite disposal.

6.4.2 Storage Tanks

One 21,000-gallon fuel oil UST is located on the northeast portion of the subject property adjacent to the boiler room. A concrete pad with a fill pipe was observed at this location during the Site reconnaissance. Oil staining was observed on a flexible hose connected to fill pipe, and some staining was observed on the ground surface. Reportedly 4,000 to 5,000 gallons of oily sludge remains in the tank (Appendix D: Photograph No. 11).

A concrete pad and steel guard posts were observed in the south section of the subject property (Appendix D: Photograph No. 6). The concrete pad was reportedly the location of a former propane AST.

An approximate 2000-gallon steel AST was observed in the alum room located on the second floor of the main Site building (Appendix D: Photograph No. 30). This AST appeared to be empty and was reportedly used to store water for the Site boiler system.

A polyethylene tank was observed in the chlorinator room (Appendix D: Photograph No. 17). The tank was reportedly used to store and mix chlorine solution for use in Site process water. The tank appeared empty at the time of the Site reconnaissance.

One steel propane tank was observed in the basement. The tank appeared to be associated with the dryers of the former paper machine.

One small unlabeled, sealed tank was also observed in the south portion of the basement. The purpose of this tank is unknown. No spills or staining indicating a previous release was observed of the floor beneath the tank.

6.4.3 Electrical Transformers

During the Site reconnaissance, black staining was observed on the ground surface where the pole-mounted electrical transformers were previously located. The wooden utility poles remain in place (Appendix D: Photograph No. 19).

A small electrical control building was observed south of the chlorinator building (Appendix D: Photograph No. 18). Numerous electrical panels and switches were observed. No leakage or staining was observed on the floor of the building during the Site reconnaissance.

6.4.4 Wells, Sumps, Drains, and Sewers

Four groundwater supply wells were observed on the subject property. One well is located in a room north of the covered outdoor storage area (Appendix D: Photograph No. 4). The remaining three wells are located outside and west of the boiler room. Two of the outside wells are located in pumphouses. One pumphouse is attached to the exterior wall of the boiler room (Appendix D: Photograph Nos. 14 and 15), the second pumphouse is attached to the Graphic Packaging International building. The third outside well is located in a concrete vault.

Two of the wells provided process water to the plant during the most recent manufacturing operations. These included the well near the covered outdoor storage area and the well located in the pumphouse attached to the boiler room. During the site reconnaissance, the three wells located indoors or in pumphouses appeared to be intact with the pump and wiring still in place. The pump had been removed from the outdoor well, and the well was covered with a steel plate. Upon removal of the plate, water was observed in the well at a depth of approximately 20 feet. There were no indications of contamination (odors, sheen, etc.) in the well.

The basement of the main Site building contains two drains connected to the Wellsburg sanitary sewer system. A system of trenches was observed on the basement floor leading to the sanitary sewer drains. Standing water and small amounts of sludge were observed in the trenches and at the drain locations during the Site reconnaissance. The trenches were intact and no cracks indicating the potential for leakage to underlying soil were identified. Standing water was also observed in two recirculation tanks located in the basement area. The tanks were constructed of concrete with an open end top. The approximate locations of the basement drains and recirculation tanks are presented on Figure 3.

The Site contains four outfalls (001, 002, 004, and 005). According to permit documents, non-contact cooling water discharged from Outfalls 001 and 002 and stormwater discharged from Outfalls 004 and 005. The approximate location of the outfalls is presented on Figures 2 and 3. Outfall 004 was observed in the gravel parking area south of the main Site building. No signs of contamination (sheen, odor, or staining) were observed at this outfall location. The reported location of Outfall 005 appeared to lead into a concrete vault located in the outdoor area west of the boiler room. The inside of the vault was observed during the Site reconnaissance. Standing water and apparent pulp waste was observed inside the vault. Outfalls 001 and 002 are reportedly located in the basement of the main Site building. The locations of Outfalls 001 and 002 were not identified by CEC during the Site visit.

6.4.5 Ponds and Lagoons

No evidence of existing or previously existing pits, ponds, or lagoons was observed during the Site reconnaissance.

6.4.6 Waste Disposal

No evidence indicating onsite waste disposal was observed during the Site reconnaissance.

6.4.7 Distressed Vegetation

No evidence of distressed vegetation indicating a release of hazardous substances or petroleum products was observed during the Site reconnaissance.

6.4.8 Adjacent Properties

Surrounding properties in the vicinity of the Site are mixed-use. Eagle Manufacturing Company, Inc. is located west of the Site and directly across from the former Conrail tracks. West Virginia Transit Assistance is located directly south of Eagle Manufacturing and borders 22nd Street. Graphic Packaging International borders the Site to the North. Residential properties are located south and east of the Site, directly beyond 22nd and Commerce Streets. Finally, commercial properties (Fonces Produce Market and Hair Shoppe) are located northeast of the subject property and just beyond Commerce Street. No obvious signs of environmental problems or concerns associated with these properties were observed during the Site reconnaissance.

7.0 FINDINGS, OPINION, AND CONCLUSION

7.1 FINDINGS

CEC conducted a Phase I ESA of the former Banner Fibreboard Site located at 22nd and Commerce Streets in Wellsburg, Brooke County, West Virginia. Based upon this assessment, CEC presents the following findings:

- The Site consists of approximately 3.2 acres with approximately 130,000 square feet of building space. Site buildings include the main Site building and an auxiliary stock room building. The stock room building is attached to the main Site building by an enclosed access area. Several smaller buildings/structures are attached to the main Site building and include the boiler room, a garage, and coal ash shed. The Site is presently vacant and listed for sale;
- The Site was initially developed around 1922 under the ownership of Hammond Bag & Paper Company. Hammond operated a paper recycling plant. Sanborn maps reviewed as part of this assessment indicate Hammond produced paper flour sacks. Banner purchased the property from Hammond in 1955. Banner continued similar paper recycling operations. Banner produced paper packaging materials, primarily linerboard for corrugated boxes. Manufacturing operations continued under Banner until July 2007, and Banner filed Chapter 7 bankruptcy in August 2007. RDS purchased the subject property through auction in February 2008. The facility has remained idle except for select demolition of machinery and the management of unused materials and wastes within the Site buildings;
- The Site is situated in the city of Wellsburg and is surrounded by residential, commercial, and industrial properties. Commerce Street borders the Site to the east. Graphic Packaging International borders the Site to the north. The former Conrail railroad line

borders the Site to the west. Two vacant residential buildings are located adjacent to the Site at the intersection of 22nd and Commerce Streets. The remaining portion of the Site's southern property boundary is bordered by 22nd Street. Residential properties are located south and east of the Site. Eagle Manufacturing, Inc. is located directly west of the former Conrail lines. Additional commercial properties are located northeast and southwest of the Site;

- Historical operations at the facility have included the on-site storage and use of petroleum products, including gasoline, oils (new and used), lubricants, and varsol (mineral spirits). Gasoline was stored onsite in a 2,000-gallon fiberglass UST. The gasoline UST was installed in 1976 and reportedly removed in 1990. Available closure documents indicate the UST had not leaked; however, no sampling results confirming clean closure were contained in the documents. Fuel oil was reportedly stored in combination with waste oil in a 21,000-gallon UST located near the boiler room. Oils and lubricants were used in the operation and maintenance of Site equipment. Used oils were collected in drums, near the point of generation, and were transferred to the 21,000-gallon UST to supplement the fuel oil used to fire the Site boiler system. In the September 2007 WVDEP Closure Inspection Report, oil staining on the ground surface was noted at multiple locations near the UST area (Appendix E);
- Numerous containers (drums, polyethylene totes, etc.) of unused product/waste materials, as well as loose paper and other wastes, remain on the Site. These materials were inventoried by WVDEP in the September 6, 2007 Closure Inspection Report. All unused products and waste materials will be removed by RDS before the property is sold;
- Minor spills and stains were observed on the concrete floor inside the main building around several of the drums described above. These spills represent de minimis conditions and are not considered a REC;

- An asbestos containing material (ACM) survey and the removal of ACM has reportedly been performed on Site buildings under the direction of RDS; and
- Based on the findings of the environmental database search, two offsite properties, Continental Baking Company and Stone Container Corporation, have the potential to cause RECs on the subject property. Both properties are listed by EDR as WV UST facilities. EDR reports the USTs have been closed. However, both properties are located in expected hydraulically upgradient positions from the subject property. Stone Container Corporation is located north and adjacent from the Site, and Continental Baking Company is located at the intersection of Togo and Commerce Streets, less than 150 feet from the subject property. A summary of the EDR search is presented in Section 4.1.

7.2 OPINION AND CONCLUSION

7.2.1 Data Gaps

Based upon the information gathered during the interviews, a review of records and maps, and observations made during the Site reconnaissance, it is our opinion that in light of the totality of information presented in this report there are no data gaps as defined by ASTM associated with this assessment except for the following:

- While the property owner indicated there were no environmental liens and/or AULs for the Site, an independent environmental lien search was not performed for the subject property. This constitutes a data gap as defined by ASTM E 1527-05; and
- The first developed use of the subject property was not determined following review of the standard historical record sources. The earliest record obtained during the Phase I ESA indicating the first site use was the 1923 Sanborn Fire Insurance Map. The 1923

map shows a building with the name “Hammond Paper Bag Co.”. No historical records prior to 1923 were available that depict the subject property as undeveloped, and as such, this constitutes a data failure. This data failure does not represent a significant data gap with respect to identifying RECs on the subject property.

7.2.2 Conclusions

We have performed this Phase I ESA in conformance with the scope and limitations of ASTM Practice E 1527-05. Any exceptions to, or deletions from, this practice are described in Sections 1.4, 6.1, and 8.1 of this report. This assessment has revealed the potential for RECs in connection with the following:

- The 21,000-gallon waste oil UST and associated underground transmission lines located near the boiler room. Based on the age of the UST (approximately 40 years), there is the potential that subsurface releases have occurred;
- Historical handling and storage of used oil near the 21,000-gallon waste oil UST area. During the Site reconnaissance, oil staining was observed on a flexible hose connected to the fill pipe, and staining was observed on the ground surface near the well pad. The September 2007 WVDEP Closure Inspection Report also noted oily spillage at multiple locations in this area. The WVDEP further stated used oil storage was observed in the coal ash shed and garage which are located adjacent to this area (Appendix E);
- Potential impacts to the Site from the former 2,000-gallon gasoline UST. Documentation obtained from the WVDEP indicates the UST installed in 1976 by a certified tank installer was closed and removed from the Site in 1990. The documentation states a site assessment was completed and no evidence of leaks was detected; however, no sampling and analytical results were provided in the documents confirming clean closure;

- Stained soil beneath the former location of the former pole-mounted electrical transformers. The transformers were removed by RDS during demolition activities. Reportedly, transformer oils were sampled and analyzed for PCB content prior to demolition, and analytical results indicated the oils were non-PCB containing. However, documentation regarding PCB content of the transformer oils was not provided by RDS;
- An inactive rail spur is located along a portion of the western site boundary. The rail ties may have been treated with wood preservatives that may have contained polynuclear aromatic hydrocarbons (PAH) or arsenic; and
- Potential impacts to the Site from adjacent offsite properties. Continental Baking Company and Stone Container Corporation were listed by EDR in the environmental database report as WV UST facilities. EDR reports the USTs were closed. However, both properties are located in expected hydraulically upgradient positions from the subject property. Stone Container Corporation is located north and adjacent from the Site, and Continental Baking Company is located at the intersection of Togo and Commerce Streets, less than 150 feet from the subject property.

It is our opinion that a Phase II investigation is warranted to address the RECs identified and discussed above.

In addition to the assessment activities recommended above, two additional items warrant further action.

- All waste materials (containers, loose materials, and residues) located within the onsite buildings should be characterized and properly disposed prior to demolition of the buildings. The contents of the small steel tank in the basement should also be identified and, if present, disposed of properly; and



- If no future use of the four groundwater supply wells is planned, the wells should be decommissioned in accordance with WVDEP guidelines and regulations.

8.0 DEVIATIONS AND ADDITIONAL SERVICES

8.1 DEVIATIONS

CEC performed this environmental assessment consistent with professional standards and in accordance with the scope and limitations defined in ASTM E 1527-05. There were no known deviations from ASTM E 1527-05 during the preparation of this report.

8.2 ADDITIONAL SERVICES

There were no non-scope considerations as defined by ASTM completed by CEC in conjunction with this assessment.



9.0 REFERENCES

The following reference documents were used in preparation of this report:

1. Civil & Environmental Consultants, Inc., "Proposal for Environmental Consulting Services, Brownfields Assessment Project, Hazardous Substances and Petroleum Grants, Brooke and Hancock Counties, West Virginia," dated September 24, 2009.
2. Certified Sanborn Map Report, Banner Fiber Board, Map dates: 1897, 1913, 1923, 1929, 1946, and 1960, Environmental Data Resources, Inc., Inquiry Number: 2879970.3, September 28, 2010.
3. The EDR Aerial Photo Decade Package, Banner Fiber Board, Photograph dates: 1948, 1954, 1959, 1966, 1976, 1982, 1988, 1993, 1997, 2005, and 2006, Environmental Data Resources, Inc., Inquiry Number: 2879970.5, September 29, 2010.
4. The EDR-City Directory Abstract, Banner Fiber Board, Environmental Data Resources, Inc., Inquiry Number: 2905089.1, October 29, 2010.
5. The EDR Historical Topographic Map Report, Banner Fiber Board, Map dates: Steubenville Quad – 1904 and 1942; Steubenville East Quad – 1958, 1968, 1978, 1981, and 1997, Environmental Data Resources, Inc., Inquiry Number: 2879970.4, September 28, 2010.
6. The EDR Radius Map Report with GeoCheck, Banner Fiber Board, Environmental Data Resources, Inc., Inquiry Number: 2879970.2s, September 28, 2010.
7. Personal Communication, Robert S. Tatsch with Mr. Dan Gilchrist, former plant manager of Banner Fibreboard, October 1, 2010.

8. Telephone Interview, 330-429-0444, Robert S. Tatsch with Mr. Rob Swindell, minority owner of RDS Industrial, LLC, October 20, 2010.
9. Telephone Interview, 304-238-1220, Robert S. Tatsch with Mr. Jamie Fenske, Environmental Inspector Supervisor for the Northern Unit of the WVDEP, October 22, 2010.
10. NPDES Permit Renewal (WV0004430) for Banner Fibreboard Company, prepared by MSES Consultants, Inc., March 2005; Obtained by CEC from WVDEP FOIA Request No. 2010-052-10.
11. UST Documents for Banner Fibreboard Company; Obtained by CEC from WVDEP FOIA Request No. 2010-052-10.
12. WVDEP Facility Inspection Reports, Banner Fibreboard Company; Obtained by CEC from WVDEP FOIA Request No. 2010-052-10.
13. WVDEP Closure Inspection Report, Banner Fibreboard Company, Prepared by WVDEP, dated September 6, 2007; Obtained by CEC from WVDEP FOIA Request No. 2010-052-10.



10.0 QUALIFICATIONS, SIGNATURES, AND DECLARATION

Mr. Robert S. Tatsch is the author and Mr. David N. Olson is the reviewer of this report. Their resumes are included in Appendix A.

We declare that to the best of our professional knowledge and belief, we meet the definition of Environmental Professional (EP) as defined in 40 CFR Section 312.10. We have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the Site. We have developed and performed all appropriate inquiries in conformance with the professional standards and practices set forth in 40 CFR Part 312.

Handwritten signature of Robert S. Tatsch in blue ink. The signature is cursive and includes the word "David" written above the main signature.

Robert S. Tatsch
Assistant Project Manager

Handwritten signature of David N. Olson in blue ink. The signature is cursive and stylized.

David N. Olson, P.G.
Vice President



NORTH

WEST VIRGINIA TRANSIT
ASSISTANCE

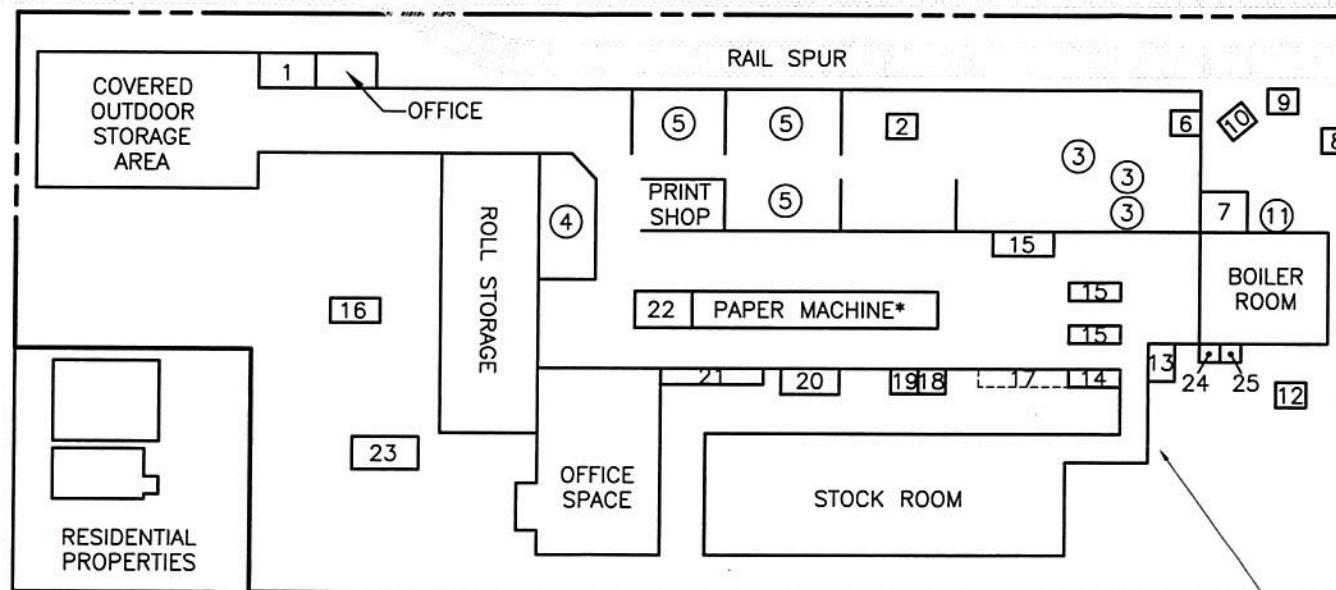
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RAILROAD TRACKS

RAIL SPUR

1. WATER SUPPLY WELL
 2. ELEVATOR
 3. HYDRAPULPERS*
 4. INK STORAGE ROOM
 5. WASTE STORAGE BAYS
 6. CAUSTIC FLAKE STORAGE AREA
 7. PUMPHOUSE / WATER SUPPLY WELL
 8. PUMPHOUSE / WATER SUPPLY WELL
 9. WATER SUPPLY WELL
 10. OUTFALL 005
 11. BOILER STACK
 12. 21,000 GALLON FUEL OIL UST
 13. OIL STORAGE ROOM
 14. DYE SHOP
 15. PULPER SYSTEM MACHINERY*
 16. OUTFALL 004
 17. ELECTRICAL TRANSFORMERS*
 18. MOTOR CONTROL CENTER
 19. CHLORINATOR BUILDING
 20. ELECTRICAL ROOM
 21. OFFICES / TESTING LABORATORY
 22. DRYERS*
 23. CONCRETE PAD FOR FORMER PROPANE AST
 24. GARAGE
 25. COAL ASH SHED
- * - DENOTES REMOVED

22ND STREET



GRAPHIC
PACKAGING
INTERNATIONAL

APPROXIMATE LOCATION OF
2,000-GALLON GASOLINE UST.
EXACT LOCATION UNKNOWN. THE
UST WAS REMOVED IN 1990.

COMMERCE STREET

23RD STREET

TOGO STREET

RESIDENTIAL PROPERTIES

RESIDENTIAL PROPERTIES

HAIR SHOPPE

FONCES PRODUCE MARKET



Civil & Environmental Consultants, Inc.

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BANNER FIBREBOARD
WELLSBURG, BROOKE COUNTY,
WEST VIRGINIA

SITE LAYOUT-MAIN FLOOR

DRAWN BY: JHG CHECKED BY: RSR
DATE: OCT. 15, 2010 DWG SCALE: N.T.S.

APPROVED BY: [Signature]
PROJECT NO: 091-709

FIGURE NO:

2